

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ANNA CHIMANSKI, et., al.,

Case No. 17-CV-4306

Plaintiff

vs.

HON. AMY J. STEVE

FRONTIER AIRLINES INC

Defendant

Request to Appear Telephonically

PLAINTIFF'S MOTION FOR ADJOURNMENT AND CONTINUANCE OF IN-COURT APPEARANCE

NOW COMES the above-named Plaintiffs, **ANNA CHIMANSKI and ILLONA CHIMANSKI**, by and through his counsel of record, Attorney Vladimir M. Gorokhovsky of **GOROKHOVSKY LAW OFFICE LLC**, and upon all the files, records and proceedings heretofore had herein, respectfully moves this Honorable Court for an Order of Adjournment and Continuance of In-Court Appearance as presently scheduled by this Court for 9-18-17 at 10:00AM.

FURTHER, in further legal and factual support of this motion the above-named Plaintiffs by thier undersigned counsel of record hereby states as follows:

1. That on September 13, 2013 this Court, while acting *sue sponte*, scheduled a court appearance for status on September 18, 2017 at 10:00AM. Dct. 27.
2. That however the undersigned counsel of record for the above-named plaintiff will not be able to appear at 10:00AM on September 18, 2017 due to compelling scheduling conflict.

3. That, in particular, at 9:00AM on September 18, 2017 the undersigned counsel is affirmatively scheduled to appear at Milwaukee County Courthouse before Hon. Michelle Haves for the trial on merits in the case of State v. Brian Blanchard, Milwaukee County Case No. 2016-CF-3934.

4. That this trial was scheduled several months ago will not be adjourned.

5. That this trial is anticipated to take several days of undersigned counsel's time.

6. That based on the foregoing the undersigned counsel of record for the above-named Plaintiffs is respectfully requesting this court to continue said in-court appearance to September 25, 2017 or September 26, 2017 at 10:00AM or preferably at 10:00 AM.

7. That alternatively the undersigned counsel is hereby respectfully requesting the leave of this Court to appear telephonically at 10:00AM on September 18, 2017 for status hearing set forth by this Court on September 13, 2017.

WHEREFORE the above-named Plaintiffs by the undersigned counsel of record is respectfully requesting the following relief:

(1) order of adjournment and continuance of in-court appearance of September 18, 2017 to September 25-26, 2017 at 10:00 A.M or at 11:00AM; and

(2) or in alternative the leave of this Court to allow undersigned counsel to appear telephonically for status hearing at 10:00AM on September 18, 2017; and

(3) for any other and further relief deems to be fair and just by this Court.

PLEASE TAKE NOTICE that the undersigned counsel of record for the above-named Plaintiffs is hereby respectfully requesting the leave of this Court to appear telephonically for a hearing in the above-captioned matter.

Dated this 14th day of September 2017.

Respectfully submitted by
GOROKHOVSKY LAW OFFICES, LLC
Attorney for Plaintiffs

BY: /s/ Vladimir M. Gorokhovsky
Vladimir M. Gorokhovsky, LL.M.
ILND TR. 10994

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on September 14th, 2017, he served the foregoing document by electronically filing the same with the Clerk of the U.S. Federal Court for the Northern District of Illinois, by using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

/s/ Vladimir M. Gorokhovsky, Esq.